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PROPOSED COUNSEL FOR DEBTORS

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION**

IN RE:	§	CHAPTER 11
	§	
NATIONAL RIFLE ASSOCIATION	§	CASE NO. 21-30085-hdh11
OF AMERICA and SEA GIRT LLC,	§	
	§	
DEBTORS¹	§	Jointly Administered

DEBTORS' WITNESS AND EXHIBIT LIST
FOR HEARING TO BE HELD ON FEBRUARY 10, 2021

The National Rifle Association of American and Sea Girt LLC (the "Debtors") may call the following witnesses and introduce the following exhibits at the hearing scheduled on February 10, 2021 at 2:00 p.m. in the above-captioned proceeding (the "Hearing"):

I. WITNESSES

1. The Debtor reserves the right to call the following individual as witnesses at the Hearing:
 - a. Sonya Rowling
 - b. Any witness(es) identified or called by any other parties; and
 - c. Rebuttal witnesses, as necessary.

¹ The last four digits of the Debtors' taxpayer identification numbers are: 6130 (NRA) and 5681 (Sea Girt). The Debtors' mailing address is 11250 Waples Mill Road, Fairfax, Virginia 22030.

II. EXHIBITS

2. The Debtors reserve the right to introduce the following document as an exhibit at the Hearing:

EXHIBIT NO.	DESCRIPTION
1	Declaration of Shawne E. Soto in Support of Certain First Day Motions [Docket No. 10]
2	Declaration of Robert G. Owens in Support of Certain First Day Motions [Docket No. 11]
3	Declaration of Sonya B. Rowling in Support of Certain First Day Motions [Docket No. 12]
4	Exhibit B to Utilities Motion [Docket No. 19]
	Any exhibit(s) offered or introduce by any other parties
	Rebuttal exhibits, as necessary

3. The Debtors reserve the right to supplement this Witness and Exhibit List.

Dated: February 9, 2021

Respectfully submitted,

/s/Patrick J. Neligan, Jr.

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PROPOSED FOR THE DEBTOR

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the 9th day of February 2021 a true and correct copy of the foregoing was served electronically via this Court's CM/ECF notification system.

/s/ John D. Gaither
John D. Gaither